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August 26, 2022

VIA ECF

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 1506
New York, NY 10007

Re: *In re Global Brokerage, Inc. f/k/a FXCM, Inc. Securities Litigation*,
Master File No. 1:17-cv-00916-RA-BCM

Dear Judge Abrams:

Plaintiffs 683 Capital Partners, LP, Shipco Transport Inc., and E-Global Trade and Finance Group, Inc., (“Plaintiffs”) and Defendants Global Brokerage, Inc. f/k/a FXCM, Inc., Dror Niv, and William Ahdout (“Defendants” and with Plaintiffs, the “Parties”) submit this joint letter pursuant to the Court’s instruction during the conference held on August 19, 2022, to propose a schedule of events relating to the joint pretrial order. The Parties jointly propose the following schedule:

1. On or by October 14, 2022:

- a. Plaintiffs shall serve on Defendants an initial draft of the joint pretrial order, including the information required under Fed. R. Civ. P. 26(a)(3) and the items listed under Sections 6(A) of Your Honor’s Individual Rules of Practice in Civil Cases (“Individual Rules”), as well as an initial draft of the joint proposed *voir dire* questions, verdict form, and jury instructions, per Section 6(B)(iii) of the Individual Rules; and
- b. Defendants shall serve on Plaintiffs their initial lists of trial witnesses, designations of deposition testimony, and list of exhibits as contemplated by Sections 6(A)(viii)-(x) of the Individual Rules and Fed. R. Civ. P. 26(a)(3).

2. On or by November 14, 2022:

- a. Defendants shall serve on Plaintiffs their proposed mark-ups of the draft joint pretrial order and the draft joint proposed *voir dire* questions, verdict form, and jury instructions; and
- b. The Parties shall exchange counter-designations and objections to the opposing parties’ initial submissions under Sections 6(A)(viii)-(x) of the Individual Rules and Fed. R. Civ. P. 26(a)(3).

3. On or by December 14, 2022:

- a. The Parties shall finalize, and Plaintiffs shall file, a final joint pretrial order and joint proposed *voir dire* questions, verdict form, and jury instructions; and
- b. The Parties shall file and serve any motions *in limine* or pretrial memoranda contemplated by Section 6(B)(i)-(ii) of the Individual Rules.
- c. The Parties shall submit to the Court and serve on opposing counsel, but not file, all documentary exhibits.

4. On or by January 25, 2023, the Parties shall file any objections or documents in opposition as contemplated by Section 6(D) of the Individual Rules.

A proposed scheduling order is submitted herewith.

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/Joshua Baker

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